

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2008 JUN 22 P 3:20

SHENIA DANCY-STEWART as Administratrix  
of the Estate of EVELINE BARROS-CEPEDA,  
Plaintiff

v.

THOMAS TAYLOR, Jr., and the  
CITY OF BOSTON  
Defendants

Civil Action  
No.0511803MLW

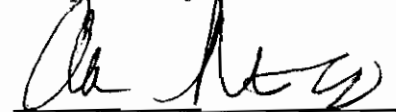
**PLAINTIFF'S MOTION FOR LEAVE TO  
VIDEOTAPE DEFENDANT'S DEPOSITION**

Plaintiff moves for leave of Court to videotape the deposition of defendant Thomas Taylor, the presently scheduled date for which is January 30<sup>th</sup> at 2:00 P.M. and January 31<sup>st</sup> from 10:00 A.M. until it is completed that same day.

Thomas Taylor is the sole individual defendant in this case and is being sued for shooting an innocent passenger in the back of a motor vehicle to death. The plaintiff states that the availability of visual information cannot help but enhance the jury's ability to assess demeanor and credibility of this crucial witness at the time he is being asked the questions for the first time and in the absence of any opportunity to go over, rehearse or otherwise practice for his appearance in Court.

Given the compressed timetable for discovery and the imminence of this deposition, a prompt ruling by the Court is requested.

Respectfully submitted



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1/22/08  
CDL